

**Exhibit D**

**Proposed Order**

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO  
RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,  
*et al.*,

Debtors.<sup>1</sup>

THE COMMONWEALTH OF PUERTO RICO,  
THE EMPLOYEES RETIREMENT SYSTEM  
OF THE GOVERNMENT OF THE  
COMMONWEALTH OF PUERTO RICO, AND  
THE PUERTO RICO HIGHWAYS AND  
TRANSPORTATION AUTHORITY,

Movants,

v.

GROUP WAGE CREDITORS,

Respondents.

PROMESA  
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

Re: ECF No. 18334

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

**[PROPOSED] ORDER GRANTING DEBTORS' MOTION FOR ORDER  
EXCLUDING TESTIMONY OF ANDRES MERCADO BONETA**

Upon consideration of the *Debtors' Motion to Exclude Testimony of Andrews Mercado Boneta* [ECF No. 18334] (the “Motion”), filed by the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the sole Title III representative of the Commonwealth of Puerto Rico (the “Commonwealth”), the Puerto Rico Public Buildings Authority (“PBA”), and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS,” and together with the Commonwealth and PBA, the “Debtors”) pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”)<sup>2</sup>, and the Debtors’ accompanying papers and pleadings, and it appearing that (i) the Court has subject-matter jurisdiction over the Motion pursuant to PROMESA section 306(a)(1); (ii) venue of this proceeding is proper under PROMESA sections 106(a) and 307, and 28 U.S.C. 1391(b); and (iii) the Court has found good cause to grant the relief requested in the Motion, and in the absence of any opposition by the Group Wage Creditors<sup>3</sup> and in accordance with Section III, paragraph P of the *Fifteenth Amended Case Management Procedures* [ECF No. 17127-1], it is hereby

**ORDERED** that:

1. The Motion is **GRANTED** as set forth herein.
2. The Group Wage Creditors are hereby precluded from entering any testimony of Andres Mercado Boneta into evidence in connection with Plan confirmation proceedings.
3. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

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<sup>2</sup> PROMESA is codified at 48 U.S.C. §§ 2101–2241.

<sup>3</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

Dated: \_\_\_\_\_  
\_\_\_\_\_  
United States District Judge Laura Taylor Swain